## REMARKS/ARGUMENTS

### 1.) Claim Amendments

Claims 4, 8-14, 16-19, 22, 31-37, 39-41, 51, and 52 are pending in the application. The claims have not been amended. Favorable reconsideration of the application is respectfully requested in view of the following remarks.

### 2.) Request for Telephone Interview

The Applicants respectfully request a telephone interview with the Examiner and his supervisor or primary examiner. The Applicants' attorney, Steven W. Smith, is available any Monday, Wednesday, or Friday from 9:30 am to 6:00 pm Eastern time at (972) 583-1572. The subject of the interview is claims 51 and 52. The arguments below are to be discussed.

### 3.) Claim Rejections – 35 U.S.C. § 112

On page 3 of the Office Action, the Examiner rejected claims 4, 8-14, 16-19, 22, 31-37, 39-41, and 51-52 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner contends that the specification does not provide support for the limitations of newly added claims 51 and 52. In particular, the Examiner contends there is no support for the steps of encrypting authentication and authorization information in a mobile node, sending the encrypted information, forwarding the encrypted information, and performing an analysis of the encrypted information. The Applicants respectfully disagree.

Support for these steps is found *at least* in the following locations in the specification:

Page 3, lines 1-7;

Page 3, lines 19-24;

Page 3, line 28 through page 4, line 8;

Page 4, lines 10-15;

Page 4, lines 21-30;

Page 6, lines 17-24;

Page 6, line 26 through page 7, line 4;

Page 7, lines 12-21;

Page 8, lines 16-25;

FIGS. 2-4;

AND MANY MORE.

The problems with this examination all stem from earlier office actions in which the Examiner did not understand what "transparent" meant or what it meant to be a mere pass-through agent. He has continued to cite references in which the intervening nodes are expressly stated to perform certain functions on packets passing through them, and thus the transmissions are clearly not transparent, and the intervening nodes are not mere pass-through agents.

In the Applicants' last response, the claims were amended to clearly and concisely recite that the intermediate nodes in the visited network (AAA client and AAA server) forward encrypted authentication and authorization information between the mobile node and the home AAA server without analyzing the encrypted information. These steps were added in an attempt to educate the Examiner regarding the meaning of a transparent communication. The Examiner now contends that these steps are not supported by the specification. Again, this is clearly wrong. In fact, to one of ordinary skill in the art, the entire specification supports these steps.

A telephone interview with an experienced primary examiner or SPE present is respectfully requested.

## 4.) Examiner Objections - Specification

On page 4 of the Office Action, the Examiner objected to the specification as failing to provide proper antecedent basis for the claimed subject matter. The Examiner objects to the same material referred to in the § 112 rejection above. The Applicants respectfully disagree. To one of ordinary skill in the art, the entire specification supports these steps.

**5.)    Claim Rejections – 35 U.S.C. § 102(e)**

The Examiner rejected claims 4, 16-17, 19, 39-40, and 51-52 under 35 U.S.C. § 102(e) as being anticipated by Faccin, et al., (hereinafter "Faccin '844"), US Patent Publication No. 2002/0120844. The Applicants respectfully disagree.

In his analysis, the Examiner notes that in Faccin '844, the visited domain 202 forwards encrypted information to the home AAA server because the visited domain cannot decrypt it. (Para. 0065). However, paragraph 0065 goes on to say, "Before transmitting it to the home domain, the visited domain adds its own DH value encrypted with K1, i.e. the security association shared between the visited domain 202 and the home domain 204." In addition, the visited domain decrypts the return message from the home AAA server as noted in paragraph 0067. Thus, the visited domain is not acting merely as a pass-through agent.

Again, the Examiner is citing a reference in which the intervening nodes are expressly stated to perform certain functions on packets passing through them, and thus the transmissions are clearly not transparent, and the intervening nodes are not mere pass-through agents. Therefore, withdrawal of the § 102 rejection is respectfully requested.

**6.)    Claim Rejections – 35 U.S.C. § 103(a)**

The Examiner rejected claims 8-10, 12-14, 22, 31-33, and 35-37 under 35 U.S.C. § 103(a) as being unpatentable over Faccin '844, as applied to claims 51 and 52 above, in view of Faccin, et al. (hereinafter "Faccin_Internet-Draft"), "Diameter Mobile IPv6 Application, draft-le-aaa-diameter-mobileipv6-6-03.txt," Internet Draft, XP015004098. The Applicants respectfully disagree.

As noted above, Faccin '844 expressly teaches away from the claimed invention by stating that the visited domain decrypts messages sent from the home AAA server to the mobile node, as noted in paragraph 0067. The Examiner cites Faccin_Internet-Draft for disclosing the Extensible Authentication Protocol (EAP). However, the EAP protocol does not teach or suggest a process in which intermediate nodes in the visited network (AAA client and AAA server) forward encrypted authentication and authorization information between the mobile node and the home AAA server without analyzing the

encrypted information. Thus, the combination of Faccin '844 and Faccin_Internet-Draft does not establish a *prima facie* case of obviousness as required by MPEP 2143. Therefore, withdrawal of the § 103 rejection is respectfully requested.

The Examiner rejected claims 11 and 34 under 35 U.S.C. § 103(a) as being unpatentable over Faccin '844 and Faccin_Internet-Draft, as applied to claims 51 and 52 above, and further in view of Akhtar et al., (hereinafter "Akhtar"), US Patent No. 7,079,499. The Applicants respectfully disagree.

The deficiencies of Faccin '844 and Faccin_Internet-Draft are noted above. The Examiner cites Akhtar to show the additional limitations recited in dependent claims 11 and 34. However, like Faccin '844 and Faccin_Internet-Draft, Akhtar also fails to teach or suggest a system or method in which authentication and authorization information is passed through the AAA client and the visited AAA server without analyzing the information. Thus, a prima facie case of obviousness has not been established. Therefore, withdrawal of the § 103 rejection is respectfully requested.

The Examiner rejected claims 18 and 41 under 35 U.S.C. § 103(a) as being unpatentable over Faccin '844, as applied to claims 51 and 52 above, in view of Akhtar et al., (hereinafter "Akhtar"), US Patent No. 7,079,499. The Applicants respectfully disagree.

The deficiencies of Faccin '844 are noted above. The Examiner cites Akhtar to show the additional limitations recited in dependent claims 18 and 41. However, like Faccin '844, Akhtar also fails to teach or suggest a system or method in which authentication and authorization information is passed through the AAA client and the visited AAA server without analyzing the information. Thus, a prima facie case of obviousness has not been established. Therefore, withdrawal of the § 103 rejection is respectfully requested.

## 6.) Conclusion

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore,

respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 4, 8-14, 16-19, 22, 31-37, 39-41, 51, and 52.

Please call the Applicants' attorney at the number below to schedule a telephone interview.

Respectfully submitted,

Date: _____October 28, 2009_____

Steven W. Smith
Registration No. 36,684

Ericsson Inc.
6300 Legacy Drive, M/S EVR 1-C-11
Plano, Texas 75024

(972) 583-1572
steve.xl.smith@ericsson.com